

UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF OHIO, EASTERN DIVISION - CLEVELAND

In re:	)	CASE NO. 20-11614
	)	
ROBERT FRANKLIN TRAVIS,	)	CHAPTER 13
JR.	)	
	)	JUDGE ARTHUR I. HARRIS
Debtor	)	
	)	
	)	

**NOTICE OF MOTION**  
**FOR RELIEF FROM STAY**

FOX RUN ASSOCIATION, INC. has filed papers with the court to obtain relief from the automatic stay.

**YOUR RIGHTS MAY BE AFFECTED.** You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult one).

If you do not want the court to grant the relief sought in the motion, or if you want the court to consider your views on the Motion for Relief from Stay, then on or before **May 5, 2022**, you or your attorney must:

File with the court a written request for a hearing, or if the court requires a written response, an answer, explaining your position at:

Howard M. Metzenbaum U.S. Courthouse  
201 Superior Avenue  
Cleveland, OH 44114.

If you mail your response to the Court for filing, you must mail it early enough so the Court will **receive** it on or before the date stated above.

You must also mail a copy to:

Darcy Mehling Good, Esq.  
Shannon M. McCormick  
Kaman & Cusimano, LLC

50 Public Square, Suite 2000  
Cleveland, OH 44113  
*Attorneys for Movant*

Lauren A. Helbling  
200 Public Square Suite 3860  
Cleveland, OH 44114-2321  
*Chapter 13 Trustee*

**To be served electronically via ECF**

Andrew R. Vara, Esq.  
Howard M. Metzenbaum U.S. Courthouse  
201 Superior Avenue, East - Suite 441  
Cleveland, OH 44114  
*U.S. Trustee*

Please take further notice that a Hearing on the Motion will be held on May 12, 2022 at 1:00 pm, or as soon as thereafter as this matter may be heard before the Honorable Judge Arthur Harris.

If you or your attorney do not take these steps, the court may decide that you do not oppose the relief sought in the motion and may enter an Order granting that relief.

Date: April 19, 2022

Respectfully submitted

KAMAN & CUSIMANO, LLC

/s/ Shannon M. McCormick  
Darcy Mehling Good (0068249)  
Shannon M. McCormick (0084855)  
50 Public Square, Suite 2000  
Cleveland, OH 44113  
(216) 696-0650 / FAX (216) 771-8478  
bankruptcy@kamancus.com

## **CERTIFICATE OF SERVICE**

I certify that on April 19, 2022, a true and correct copy of Notice on Motion was served via the Court's Electronic Case Filing System on these entities and individuals who are listed on the Court's Electronic Mail Notice List:-

William J. Balena, Esq., on behalf of Robert Franklin Travis, Jr., debtor

Lauren Helbling, Esq., Chapter 13 Trustee at [lhelbling13@ecf.epiqsystems.com](mailto:lhelbling13@ecf.epiqsystems.com)

Andrew R. Vara, Esq., U.S. Trustee, at [ustregisteredmailbox@usdoj.gov](mailto:ustregisteredmailbox@usdoj.gov) and at [ustpreion09.cl.ecf@usdoj.gov](mailto:ustpreion09.cl.ecf@usdoj.gov)

Cynthia A. Jeffrey, on behalf of Creditor Ford Motor Credit Company at [bankruptcy@weinerlaw.com](mailto:bankruptcy@weinerlaw.com)

Patrick A. Hruby, on behalf of Creditor Freedom Mortgage Corporation at [Patrick.hruby@brokandscott.com](mailto:Patrick.hruby@brokandscott.com)

Richard John LaCivita, on behalf of Creditor Mortgage Research Center, LLC at [bknotice@reimerlaw.com](mailto:bknotice@reimerlaw.com)

And by regular U.S. mail, postage prepaid, to:

Robert Franklin Travis, Jr.  
1130 Hunting Hollow  
Grafton, OH 44044  
***Debtor***

/s/ Shannon M. McCormick  
Darcy Mehling Good (0068249)  
Shannon M. McCormick (0084855)  
50 Public Square, Suite 2000  
Cleveland, OH 44113  
(216) 696-0650 / FAX (216) 771-8478  
[bankruptcy@kamancus.com](mailto:bankruptcy@kamancus.com)